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February 23, 2024

## By ECF

Hon. Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square, Room 2201 New York, New York 10007

Re: Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd., et al., No. 1:22-cv-02943 (PAE) [Rel. No. 1:23-cv-04774]

## Dear Judge Engelmayer:

We represent Frontier Airlines, Inc. ("Frontier") in the above-captioned proceedings. We write jointly on behalf of all parties, and pursuant to Rule 1.E. of Your Honor's Individual Rules, to respectfully request that the Court enter the revised discovery schedule entered by the Court on February 20, 2024, in the related action, Carlyle Aviation Management Ltd. v. Frontier Airlines, Inc., No. 1:23-cv-04774 (PAE) ("Lawsuit 3"). See Lawsuit 3, Dkt. No. 79. The modified schedule is set forth in the revised Civil Case Management Plan and Scheduling Order attached hereto as **Exhibit A**. The schedule will allow the parties to continue to coordinate discovery across the two cases. This is the parties' second request for an extension of the discovery schedule.

The parties respectfully request the Court enter the same case management deadlines entered in Lawsuit 3, which are set forth below and agreed to by all parties:

Event	Current Deadline	Proposed Deadline
Fact Discovery Deadline	March 22, 2024	May 22, 2024
Deadline to Serve Interrogatories	February 21, 2024	April 22, 2024
Deadline to Serve Requests to Admit	February 21, 2024	April 22, 2024
Deadline to Complete Fact Depositions	March 22, 2024	May 22, 2024
Deadline to Complete Expert Discovery	June 5, 2024	August 7, 2024



We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eric B. Fisher Eric B. Fisher

Paul A. Engelry

All Counsel of Record (via ECF) cc:

GRANTED. SO ORDERED.

Dated: February 23, 2024 New York, New York

PAUL A. ENGELMAYER United States District Judge